

EXHIBIT M

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
3 CHARLESTON DIVISION

4 IN RE: ETHICON, INC. : MDL NO. 2327
PELVIC REPAIR SYSTEM :
5 PRODUCTS LIABILITY :
LITIGATION :

7 AND VARIOUS OTHER CROSS-NOTICED ACTIONS

9 Monday, September 16, 2013

11 CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

13 Videotaped 30(b)(6) Deposition of
14 LAURA ANGELINI held at Riker Danzig Scherer Hyland
15 Perretti LLP, Headquarters Plaza, One Speedwell
16 Avenue, Morristown, New Jersey, on the above date,
17 beginning at 9:34 a.m., before Kimberly A. Overwise,
18 a Certified Realtime Reporter, Certified Court
19 Reporter, and Notary Public.

20 — — —

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1 Then in January 2000 I was promoted
2 director of marketing for Gynecare. In the meantime
3 the division name was moved from women's health to
4 Gynecare. I stayed in that position as director of
5 marketing between the year 2000 and mid-2001. In
6 June, around June I think, mid-2001 roughly, I was
7 promoted vice president for Gynecare EMEA. And then
8 I stayed in that job until the end of 2005. At the
9 end of 2005 I was moved to a position of vice
10 president, marketing for Ethicon Endo-Surgery EMEA.
11 I stayed in that job for a few weeks.

1 described here. So, for example, "Agreements
2 between Medscand, Ulmsten, Contape and Defendants
3 related to TVT," yes, I reviewed all these
4 documents. Now, if they refer to the numbers listed
5 below, I cannot say.

6 Q I understand. But it sounds like what
7 happened was you received a stack of documents that
8 were supposed to be responsive to our request --

9 A Yes.

10 Q -- and you then reviewed those; is
11 that fair?

12 A Yes.

13 Q You did not do any additional work to
14 find documents or information other than look at the
15 documents that were provided to you by counsel and
16 talk to the two individuals that you told us; is
17 that fair?

18 MS. CRAWFORD: Objection.

19 THE WITNESS: As I told you, I -- you
20 know, I spoke with Mary Amore to locate some of the
21 contracts referred to these doctors. So I would
22 suppose the answer to your question is no, because I
23 did do some additional work to locate some of these
24 documents. However, I didn't locate all the
25 documents because of the fact that in my computer

1 there is no files or storage anymore of some of the
2 documents that date back to these years. I mean, we
3 are talking about 15 years ago. Some of the
4 documents are not -- based on the Italian law are
5 not existing anymore.

6 BY MR. CARTMELL:

7 Q Ms. Angelini, you -- strike that.

8 Ms. Angelini, you mentioned that
9 because your computer was turned in and cleared,
10 there are some documents that you believe are
11 missing?

12 A Uh-huh, yes.

13 Q What documents, if you can tell me, do
14 you believe are missing?

15 A Some of the contracts of the original
16 contracts related to the consulting services of the
17 doctors listed in the deposition notice are not
18 documents that I was able to review with my counsel.
19 Therefore, I am assuming that these documents are
20 missing.

21 Q You're talking about agreements
22 between certain paid consultants that we've asked
23 about; right?

24 A Yes.

25 Q Other than some agreements that

1 existed between paid consultants of Ethicon or
2 Johnson & Johnson that are missing, are there any
3 other documents that you believe are missing as a
4 result of your computer being wiped out?

5 A Well, all the e-mails generated at
6 that time for any other -- any type of, you know,
7 interaction between me in my position as European
8 business manager for the TVT product and my
9 colleagues, my worldwide colleagues, who were
10 responsible for the same product in the other
11 regions of the world. I mean, I had all my e-mail
12 documentation. That e-mail documentation is not --
13 between, you know, the years -- with respect to this
14 product between the years 1997 and 2006, when I came
15 back, all this e-mail documentation is not present
16 anymore in my computer.

17 Q You believe that all of your e-mails
18 from 1997 until 2006 that would reflect your
19 interactions with the paid consultants are no longer
20 in existence; right?

21 MS. CRAWFORD: Objection.

22 THE WITNESS: I didn't say that. I
23 said they are not on my computer. I don't know
24 whether they are in existence in any part of the
25 company stored or copied anywhere.